



6200 Franklin Boulevard - Suite 100
Sacramento, CA 95824-3412

Telephone: (916) 395-5013
Fax: (916) 395-5197

May 7, 1999

Mr. Roberto Rodriquez
Acting Chief, RCRA Enforcement Section
United States Environmental Protection Agency, Region IX
75 Hawthorne Street
San Francisco, Ca 94105

RE: HAZARDOUS WASTE INVESTIGATION AT SILGAN CAN COMPANY, SACRAMENTO CALIFORNIA

Dear Mr. Rodriquez;

Pursuant to the hazardous waste audit and in response to the findings in your letter from April 8, 1999, the following details the response to the findings by Silgan Can Company. As an attachment to this report please see the photos and other forms that are included in the response.

FINDINGS & RESPONES

Oven:

The inspectors noted that the SAA contained a 55-gallon container of non-RCRA regulated waste, (water based rinse). The container was open and had a funnel screwed into the bung; no waste was being added at the time of the inspection.

Response:

The funnel was replaced with a new funnel with a shutoff valve that is spring loaded in the closed position. Please see photograph # 4 for a view of the new funnel.

Can Assembly:

The inspectors noted two containers at the SAA:

- One open 55-gallon container of enamel paint waste (D001). This container had a funnel screwed into the bung; no waste was being added at the time of the inspection.
- One 55 gallon container of waste oil and water. The inspectors noted that this container was not labeled with the words "used oil". This container also had a funnel screwed into the bung; no waste was being added at the time of the inspection.

Response:

The drum was labeled with the words "used oil" and the funnel was replaced with a funnel that has a shutoff valve that is spring loaded into the closed position. Please see photograph # 4 for the style of the new funnel and the drum labeled "used oil".

Press Department:

The inspectors noted four containers at the SAA:

- One 55- gallon open top container for oily rags (almost empty). Though the lid was placed on top of the container, the inspector noted that container was not closed.
- One 55- gallon container labeled as D001 (containing "DMS85"). This container was almost full and had a funnel screwed into the bung; no waste was being added at the time of the inspection;
- One 55- gallon container of waste oil and water. The inspectors noted that this container was labeled as D001, D035, F003 and F005 hazardous waste. Mr. Randal Foster informed the inspectors that he believed these containers contained non – RCRA waste oil and were mislabeled with an old Campbell label. The inspectors noted that this container was not labeled with the words "used oil";
- One 55- gallon container (empty) for waste oil and water. This container was also labeled D035, F003, and F005 hazardous waste.

Response:

The 55 – gallon container for oily rags was secured in the closed position. The drums that were labeled as D001, D035, F003, and F005 hazardous waste when it was used for "used oil" were relabeled with the words "used oil". The Campbell tags were removed and the Silgan label was put on the drum. The old style funnel was replaced with the new funnels that have a shutoff valve that is spring loaded in the closed position. Please photograph # 4 for the style of funnel and the label "used oil" put on the drums.

D & I Operations:

The inspectors noted two containers at this SAA:

- One 55- gallon container of isopropyl paint solids and water. This container was marked as a non-RCRA hazardous waste. This container was partially full and had a funnel screwed into the bung; no waste was being added at the time of the inspection;
- One 55- gallon container of D001, D035 hazardous waste, (methanol, MEK, water, etc.). This container was Partially full and had a funnel screwed into the bung, no waste was being added at the time of the inspection.

Response:

The funnel was replaced with the new style funnel that has a shutoff valve that is spring loaded into the closed position. Please see photograph #4 with the type of funnel used.

Womack Unit:

The inspectors noted three containers in this area:

- One poly container, approximately 300- gallons in capacity, ½ full of non- RCRA regulated waste oil. This unit was labeled with the words "used oil". However, it was not marked with an accumulation start date.
- One 55- gallon container containing tramp oil, which had a hazardous waste, label. It was not dated with an accumulation start date.
- One empty 55- gallon red container.

Response:

The poly container was transferred into 55-gallon drums and they were moved to the 90- day storage area. The 55- gallon container containing tramp oil was marked with an accumulation start date. The empty red 55- gallon container was labeled for "used oil" in preparation for its use at the Womack unit.

90- day Storage Area:

This area has a fire extinguisher nearby. However, there was no telephone in the immediate area, nor was there an eyewash station. This area contained 17 containers of non-RCRA waste and 1 x 55 gallon container of D001 (isopropyl and water). The label was not visible for viewing on seven of these containers.

Response:

A telephone has been installed in the 90-day storage area with a list of emergency phone numbers to call; please see photograph # 1. An eye wash station has been mounted on the fence to the 90 – day storage area; please see photograph #2. The containers in the 90-day storage area were repositioned to allow visibility of labels; please see photograph #3.

Record Review:

Inspection Records:

The facility had inspection records for all the satellite storage areas. However, they did not maintain one for the 90-day storage area.

Response:

The weekly inspection record was amended to include the 90-day storage site. Please see attachment #1 for the form used.

Contingency Plan:

The inspector reviewed the facility's contingency plan. The telephone numbers on the emergency contact list were not updated. Additionally, the locations of the fire extinguisher and spill kit in the 90-day storage area were not noted on the facility diagrams.

Response:

The telephone records for the facility contingency plan were updated and a copy was given to Mr. Anthony Chu, Hazardous Materials Specialist for the County of Sacramento. The facility diagram was amended to include the locations of fire extinguisher and spill kit within the 90-day storage area. Please see attachment #2 & 3

Training Plan:

The facility representatives were not able to produce documents showing the job titles, position descriptions and the amount and type of training for each person who works with hazardous wastes.

Response:

A "Hazardous Materials Training Policy" has been established. It details the type of training, the people to attend the training and the providers of the training. Please see attachments 4- 9.

If you have any questions or concerns in regards to this response, please feel free to contact myself at 916-399-2587 or Mr. Randy Foster at 916-399-2584.

Sincerely,



Timothy S. Lumsden
Planner

Cc: Mr. Anthony Chu, Hazardous Materials Specialist
County of Sacramento Environmental Management Department
8475 Jackson Road, Suite 230
Sacramento, California 95826

Ms. Paula Rasmussen, DTSC, CAL-EPA
5796 Corporate Ave.
Cypress, California 90630

Mr. Bob Bennett
Mr. Dennis Cornish
Mr. Skip Conway
Mr. Tom Garing
Mr. Randy Foster

Inspector of the Area will initial
above the date inspected.

Year of Inspection: _____
(Retain for three years from above date.)

INITIAL OF INSPECTOR		July					August					September					October					November					December				
DATE:		1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5	1	2	3	4	5
Collection station's in:	C/A																														
Are all drums	PRESS																														
grounded and in	OVENS																														
acceptable condition?	D & I																														
Are drums properly	C/A																														
labelled and dated?	PRESS																														
No drum older than	OVENS																														
9 months in satellite area's.	D & I																														
Are bungs in place	C/A																														
and tight if ready	PRESS																														
for transfer to waste	OVENS																														
area?	D & I																														
Drum storage area's:	HWS																														
Is the area orderly?																															
Are drums stacked	HWS																														
properly?																															
Are drums in proper shipping	HWS																														
condition?																															
Safety Equipment:	EYEWASH																														
Hazardous Waste	GLOVES																														
Shed:	BOOTS																														
	APRON				</																										

Attachment #

1st Floor Fire Extinguisher, PPE, Floor Drains & Storm Drains Map

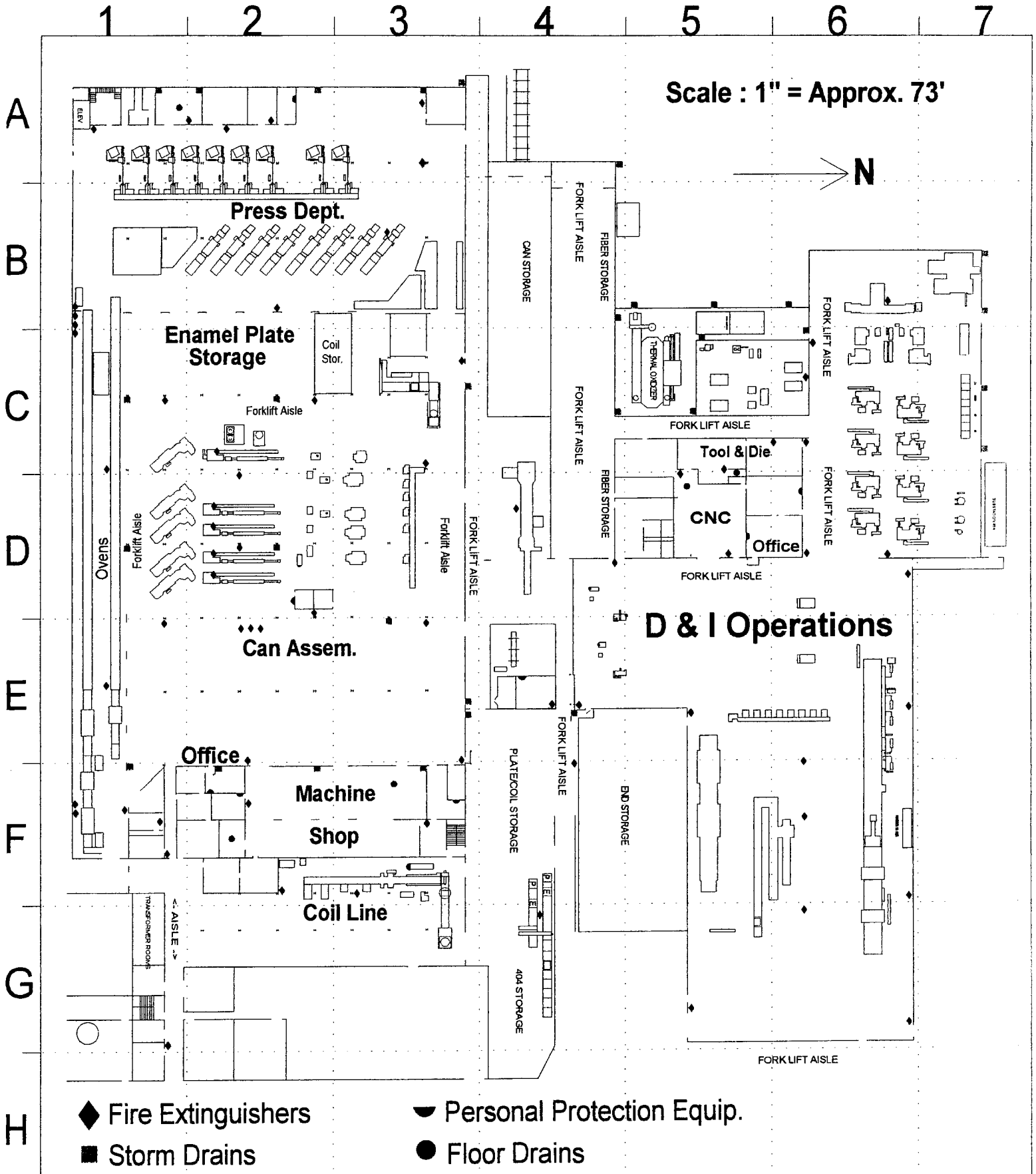
9/23/98
Map Date

Business Name : Silgan Can Company

Site Address : 6200 Franklin Blvd., Suite 100
Sacramento, CA. 95824-3412

Inspection Date

Map # : 1



Attachment #2

Medical Equipment, Emergency Showers, Eyewash, Spill Kits & MSDS Location Map

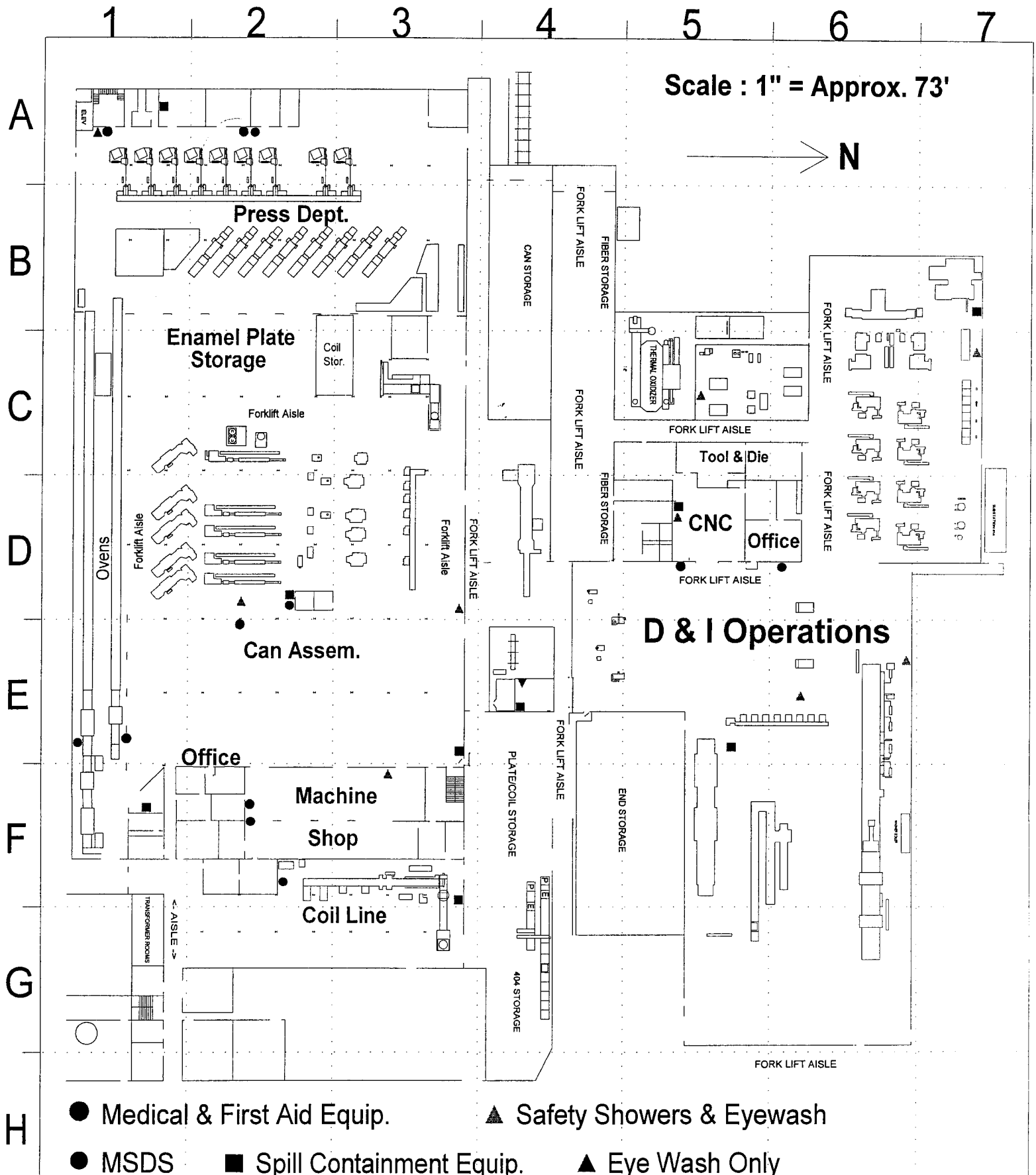
9/23/98
Map Date

Business Name : Silgan Can Company

Site Address : 6200 Franklin Blvd., Suite 100
Sacramento, CA. 95824-3412

Inspection Date

Map # : 4



Attachment #3

HAZARDOUS MATERIAL TRAINING POLICY FOR SILGAN CAN COMPANY- SACRAMENTO

PURPOSE:

The purpose of the hazardous material training for Silgan Can Company is to provide our employees the skills and knowledge on safe handling practices for hazardous waste and update them on the changes to regulations affecting hazardous waste handling.

SCOPE OF TRAINING:

There are two levels of training that the affected employees will attend. For those individuals that handle or work around hazardous waste they will be attending a two-hour class on safe practices. The DOT and RCRA training will be provided to the employees involved with transportation of hazardous waste, their Supervisor and the plant Environmental Coordinator.

TIMING OF TRAINING:

The safe handling practices for affected people will be completed by the end of July each year. The DOT and RCRA training for hazardous material will be completed by the end of October each year.

PROVIDERS OF TRAINING:

Silgan Can Company's hazardous waste handling company, **Van Waters & Roger**, as part of their contract, will provide training on hazardous waste handling.

The DOT and RCRA training is provided by **Network Environmental Systems, (NES)**.

EMPLOYEES REQUIRED TO ATTEND TRAINING:

Please see the attached spreadsheets detailing the employee names and their jobs. As people leave or join the department and are involved with hazardous waste, this list will have to be updated for those changes.

April 1999

Att. #4

EMPLOYEES TO RECEIVE HAZARDOUS MATERIAL TRAINING

Division	Job Class - Can Assembly	Shift	Name	Badge #	HAZ MAT TRAINING	DOT & RCRA TRAINING
	Technician I (AA Mechanic)	1	B GILLOCK (L)	744	YES	
			S CARTER	8869	YES	
			V ORTIZ	70279	YES	
	+ENVIRONMENTAL AREA SPECIALIST		E FARLEY	4244		YES
Con.Asm.	Associate Step 4 (Welder Operator)	1	H ASKEW	585	YES	
			J WATKINS	4781	YES	
	Technician I (AA Mechanic)	2	D GONZALES (L)	70292	YES	
			J GONZALES	70403	YES	
	Technician II (Mechanic Trainee)	2	J VAZQUEZ	8323	YES	
	Associate Step 4 (Welder Operator)	2	G GLANTON	70032	YES	
			R COOK	70250	YES	
Con.Asm.	Technician I (AA Mechanic)	3	V SINGH	7085	YES	
			R HERRERA (L)	70389	YES	

EMPLOYEES TO RECEIVE HAZARDOUS MATERIAL TRAINING

Division	Job Class - Press,Coil & Enamel	Shift	Name	Badge #	HAZ MAT TRAINING	DOT & RCRA TRAINING
Press	Associate Step 1	1	P JOHNSTON	70433	YES	
	Technician II ("A" Mechanic)					
	Technician I	1	M DeLaTORRE	8542	YES	
	("AA" Mechanic)		J GENTRY	71753	YES	
			E KAVALL	71835	YES	
			J PUEYO	71124	YES	
	Associate Step 4	1	M MARQUEZ	71515	Yes	
	(Lift Truck Driver)					
	Technician II		T GAY	70026	YES	
	("A" Mechanic)					
	Technician I	2	A VALENCIA	5642	YES	
	("AA" Mechanic)		S SEARS	73065	YES	

EMPLOYEES TO RECEIVE HAZARDOUS MATERIAL TRAINING

Division	Job Class	Shift	Name	Badge #	HAZ MAT TRAINING	DOT & RCRA TRAINING
D&I	Master D&I Technician	1	S LOPEZ (L)	2544	YES	
	Technician I	1	K SVOBODA	7048	YES	
	Associate Step 1		J NEGRETE	7532	YES	
			J DAVIDSON	70300	YES	
	Technician II	1	R BUTTERFIELD	9248	YES	
			M ZAMARANO	70770	YES	
			M SANCHEZ	70828	YES	
	Master D&I Technician	2	S YEE (L)	6405	YES	
	Technician I	2	J FLUCKER	4658	YES	
	Technician II	2	B MITCHELL	70041	YES	
			S SINGH	70813	YES	
			N AUTRAND	71229	YES	
			S RUVALCABA	71501	YES	
			M LANDI	8411	YES	
	Technician II	3	C FUENTES	8974	YES	
			D WINGWOOD	72383	YES	

EMPLOYEES TO RECEIVE HAZARDOUS MATERIAL TRAINING

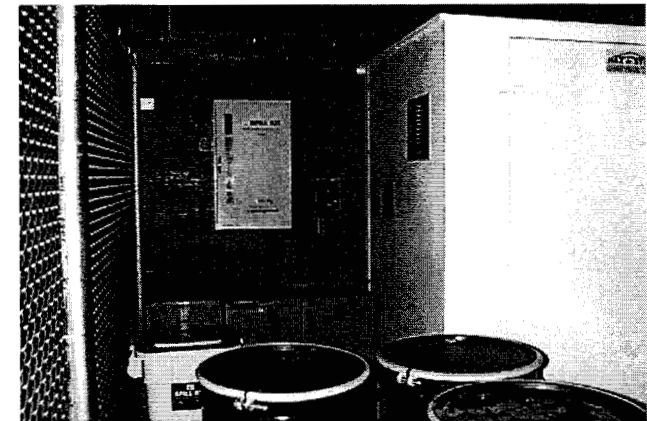
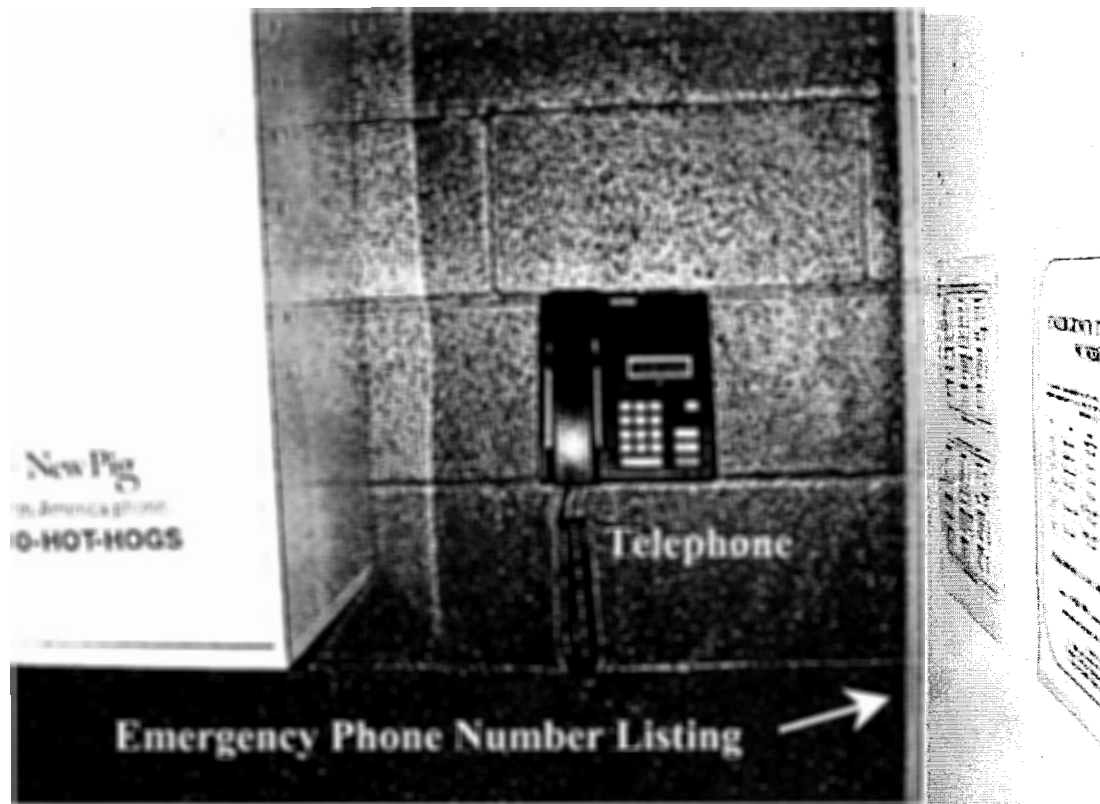
Division	Job Class	Shift	Name	Badge #	HAZ MAT TRAINING	DOT & RCRA TRAINING
Shop	Technician I ("AA" Machinist/Mechanic)	1	O LOUSTAUNAU M/L	7928	YES	
			P BESHARA	5020	YES	
			M MASON	7257	YES	
			R KLUMP	5113	YES	
			C WHITED	71060	YES	
			A KELSEY	73066	YES	
			H WERNEKE	73248	YES	
Shop	Technician I ("AA" Machinist/Mechanic)	2	J ROBERTS	6528	YES	
			W HEIKILA	73249	YES	
			A DE LA VEGA	73271	YES	

EMPLOYEES TO RECEIVE HAZARDOUS MATERIAL TRAINING

Division	Job Class	Shift	Name	Badge #	Hire Date	HAZ MAT	DOT & RCRA
						TRAINING	TRAINING
Electric	Technician I (Electrician)	1	J SHOBER	4498	70/07/21	Yes	
	Technician I (Electrician)	2	H HEIDRICH	7562	80/08/25	Yes	
	Technician I (Electrician)	3	D ONO	73961	94/10/17	Yes	
Floor	Assoicate Step 1 (Janitor)		L Portalatin	71552	88/07/14	Yes	

SILGAN CAN COMPANY - SACRAMENTO PLANT

Photograph #1: 90 Day Storage Area



Phone #	Name	City	Company or Agency	Address
501-1	Water Control	5-1		
501-2	Water Control	5-2		
501-3	Water Control	5-3		
501-4	Water Control	5-4		
501-5	Water Control	5-5		
501-6	Water Control	5-6		
501-7	Water Control	5-7		
501-8	Water Control	5-8		
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501-84	Water Control	5-84		
501-85	Water Control	5-85		
501-86	Water Control	5-86		

March 1999

SILGAN CAN COMPANY - SACRAMENTO PLANT

Photograph #2: 90 Day Storage Area



March 1999

SILGAN CAN COMPANY - SACRAMENTO PLANT

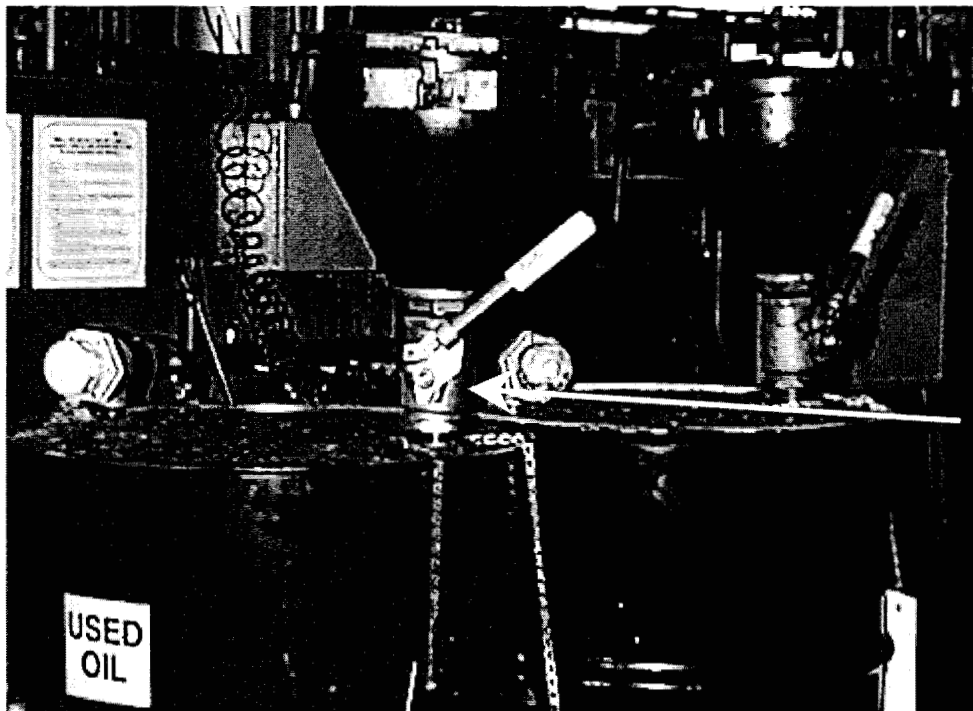
Photograph #3: 90 Day Storage Area



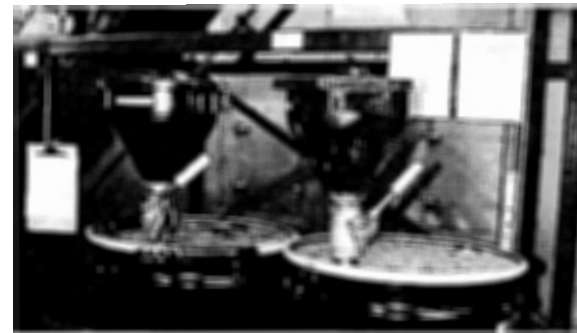
March 1999

SILGAN CAN COMPANY- SACRAMENTO PLANT

Photograph #4: Satellite Accumulation

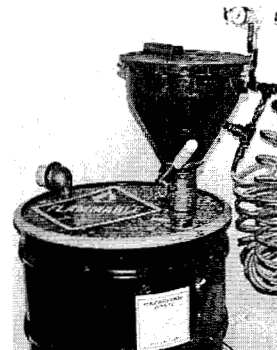


Can Assembly Area

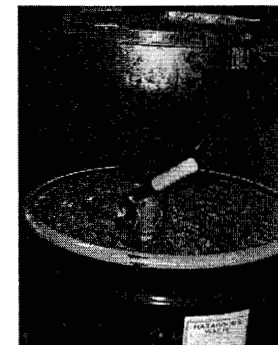


D&I Area

Shutoff Valve, Spring-Loaded In The Closed Position



Press Department



Coater/Oven Area

March 1999